

Presentment Date & Time: December 16, 2009 at 2:00 p.m. (ET)  
Objection Deadline: December 9, 2009 at 5:00 p.m. (ET)

KLESTADT & WINTERS, LLP  
Tracy L. Klestadt  
Samir P. Gebrael  
292 Madison Avenue, 17<sup>th</sup> Floor  
New York, New York 10017  
(212) 972-3000

- and -

BEASLEY ALLEN  
Rick Morrison  
218 Commerce Street  
Post Office Box 4160  
Montgomery, AL 36104  
(800) 898-2034

*Co-Counsel for Florian Hinrichs*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X	
In re	:
	:
MOTORS LIQUIDATION COMPANY, et al.,	:
f/k/a GENERAL MOTORS CORP., et al.,	:
	:
Debtors.	:
	:
-----X	

Chapter 11  
Case No. 09-50026 (REG)  
(Jointly Administered)

**NOTICE OF PRESENTMENT OF ORDER PURSUANT TO  
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY  
PROCEDURE COMPELLING THE PRODUCTION  
OF DOCUMENTS BY, AND A DEPOSITION OF, THE DEBTORS**

PLEASE TAKE NOTICE, that Florian Hinrichs ("Hinrichs"), by their co-counsel, Klestadt & Winters, LLP, will present the annexed order compelling the production of documents by, and scheduling the depositions of individuals designated by the Debtors and believed to have knowledge of the relevant matters, pursuant to Rule 2004 of the Federal Rules

of Bankruptcy Procedure, for signature and approval to the Honorable Robert E. Gerber, United States Bankruptcy Judge, Southern District of New York, at Room 621 of the United States Bankruptcy Court, One Bowling Green, New York, New York 10004-1408, **December 16, 2009 at 2:00 p.m.** (Prevailing Eastern Time).

**PLEASE TAKE FURTHER NOTICE**, that unless a written objection to the proposed order is filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-242 and the User's Manual for the Electronic Case Filing System can be found at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov), the official Website for the Bankruptcy Court), by registered users of the Bankruptcy Court's case filing system and, by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), Wordperfect or any other Windows-based word processing format (with a hard-copy delivered directly to Chambers), and served in accordance with General Order M-242, and served upon Tracy L. Klestadt and Samir P. Gebrael, Klestadt & Winters, LLP, 292 Madison Avenue, 17<sup>th</sup> Floor, New York, New York 10017, to allow actual receipt of the foregoing by no later than **December 9, 2009 at 5:00 p.m.**, the order may be signed.

**PLEASE TAKE FURTHER NOTICE**, that if timely objections are filed and served, or if the Court so directs, a hearing will be held before the Honorable Robert E. Gerber, United States Bankruptcy Judge, at a date to be scheduled by the Court, upon such additional notice as the Court may direct.

Dated: New York, New York  
November 13, 2009

KLESTADT & WINTERS, LLP

By: /s/ Samir P. Gebrael  
Tracy L. Klestadt  
Samir P. Gebrael

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